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## COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A.

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Co-Counsel for Plaintiff, The Class 10 Liquidation Trust

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY HONORABLE GLORIA M. BURNS CASE NO. 08-14631 (GMB)

Chapter 11 (Jointly Administered)

In re:

SHAPES/ARCH HOLDINGS L.L.C., et al.,

Reorganized Debtors.

NOTICE OF MOTION OF THE CLASS 10 LIQUIDATION TRUST'S FIFTH OMNIBUS OBJECTION TO CLAIMS (Claim Numbers: 81, 541, 597, 663, 699, 772, 719, 742, 743, 749, 742, 743, 744, 749, 757, 828, 901, 904, 905, 906)

HEARING DATE AND TIME: July 26, 2010 at 10:00 a.m.

ORAL ARGUMENT REQUESTED

To: All Parties-in-Interest

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PLEASE TAKE NOTICE that on July 26, 2010, at 10:00 a.m., or as soon thereafter as counsel may be heard, the Class 10 Liquidation Trust, also known as the Shapes Liquidation Trust (the "<u>Trust</u>"), established upon the effective date of the Chapter 11 plan reorganization of Shapes/Arch Holdings, L.L.C., *et al.*, the above-captioned reorganized debtors and debtors-in-possession, by and through its counsel, Cole, Schotz, Meisel, Forman & Leonard, P.A. and Halperin Battaglia Raicht, LLP, shall move before the Honorable Gloria M. Burns, U.S.B.J., at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Camden, New Jersey 08101, for entry of an order expunging and/or reducing certain claims (the "Motion").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief requested by the Movant, or if you want the court to consider your views on the Motion, then on or before **July 19, 2010** you or your attorney must:

File with the Court an answer explaining your position at: Clerk, U.S. Bankruptcy Court, U.S. Post Office & Courthouse Building, 401 Market Street, 2nd Floor, P.O. Box 2067 Camden, New Jersey 08101-2067. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You <u>must</u> also mail a copy to: Donna H. Lieberman, Esq., Halperin Battaglia Raicht LLP, 555 Madison Avenue, 9th Floor, New York, New York 10022.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Respectfully submitted,

COLE SCHOTZ MEISEL FORMAN & LEONARD, P.A.

By: <u>/s/Ilana Volkov</u>

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-and-

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Co-Counsel for the Class 10 Liquidation Trust

Dated: April 30, 2010